United States Department of Agriculture
Food Safety And Inspection Service
Technical Service Center
Suite 300, Landmark Center
1299 Farnam Street
Omaha. NE 68102

AUDIT REPORT FOR NORTHERN IRELAND

AUGUST 2 THROUGH AUGUST 7, 2002

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Northern Ireland's meat inspection system from August 2 through August 7, 2002. This audit consisted solely of reviewing Est. 9014, which was not certified to export to the United States. This establishment requested delistment just prior to the last FSIS audit of Northern Ireland's meat inspection system. FSIS advised the Northern Ireland government that the establishment would have to pass an acceptable review by FSIS before it could be relisted to export meat to the United States. Est. 9014 was conducting processing operations.

The last audit of the Northern Ireland meat inspection system was conducted in November 2001. At that time, no establishments were certified by the Northern Ireland government to export to the United States. During the previous audit, which occurred in April/May 2000, the FSIS auditor reviewed Est. 9014 and designated it as marginal/re-review. The major deficiencies reported during the April/May 2000 audit were as follows:

1. Several instances of inadequate cleaning of product-contact equipment prior to pre-operational sanitation inspection were observed.

2. Numerous examples of deteriorated product-contact equipment, in need of repair or replacement, were found to be in use.

3. No formal pre-shipment reviews were being conducted, as required.

4. The system in effect did not ensure timely re-sampling of water for portability in the event of noncompliant water samples.

5. Documentation of operational sanitation activities in the establishment was in need of improvement.

Importation of beef or beef products was not allowed at the time of this recent audit due to the presence of Bovine Spongiform Encephalopathy (BSE) in the United Kingdom.

From January 1 through June 2, 2002, Northern Ireland establishments did not export any product to the United States.

PROTOCOL

This on-site audit was conducted in three parts. One part involved visits with Northern Ireland national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the inspection office of the meat product establishment during the on-site visit. The third was conducted by an on-site visit to the establishment. There were no visits to laboratories, performing analytical testing of field samples for the national residue testing program, and culturing field samples for the presence of microbiological contamination with *Salmonella*.

Northern Ireland's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems, and (5) enforcement controls.

During the on-site establishment visit, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials. This establishment was voluntarily delisted prior to the last FSIS audit.

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were not found to be in place in the one establishment audited (Est. 9014) and this establishment was found to be unacceptable. Details of audit findings, including compliance with HACCP, and SSOPs are discussed later in this report.

Entrance Meeting

On August 2, an entrance meeting was held in the Belfast offices of the Department of Agriculture and Rural Development for Northern Ireland (DARDNI), and was attended by Mr. Bert Houston, Chief Veterinary Officer; Dr. George Mcllroy, Deputy Chief Veterinary Officer; Mr. Colin Hart, Supervisory Veterinary Officer; Mr. Jean Wales, Divisional Veterinary Officer; Mr. Tom Coulter, Divisional Veterinary Officer, Meat and Meat Hygiene, Mr. Robert Huey, Divisional Veterinary Officer, APHIS; and Dr. Oto Urban, International Audit Staff Officer, FSIS. Topics of discussion included the following:

1. The audit itinerary and lodging accommodations.

2. Discussion on the data-collection instruments that would be used during the establishment audit for SSOPs and the HACCP program.

3. Updating of the country profile information for Northern Ireland.

4. Information on the country disease status.

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of the Northern Ireland's inspection system in November 2001, except Mr. Bert Houston became the Chief Veterinary Officer.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audit of the establishment be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishment listed for the on-site review. This record review was conducted at the inspection service office in the establishment. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Food safety initiatives such as SSOPs, and HACCP programs.
- Sanitation, slaughter and processing inspection procedures and standards.
- Enforcement records.

The following concerns arose as a result the examination of these documents:

1. The SSOP documents did not accurately reflect the conditions observed in the establishment.

2. The SSOP records were not descriptive enough of some deficiencies observed on the pre-operational sanitation and preventive action was not included. Only general statements were included, such as "dirty floor."

3. The HACCP plan did not contain some of the requirements for verification, corrective action, or pre-shipment review.

Government Oversight

All inspection veterinarians and inspectors in the establishment assigned to this establishment were full-time DARDNI employees, receiving no remuneration from either industry or establishment personnel.

Establishment Audits

This audit consisted solely of reviewing Est. 9014, which was not certified at this time to export to the United States. This establishment requested delistment just prior to the last FSIS audit of Northern Ireland's meat inspection system. FSIS advised the Northern Ireland government that the establishment would have to pass an acceptable review by FSIS before it could be relisted to export meat to the United States. Est. 9014 was conducting processing operations for Northern Ireland domestic only.

Laboratory Audits

No laboratory audits were conducted during this visit.

Establishment Operations by Establishment Number

The following operations were being conducted in this one establishment:

Pork boning and processing establishment (Est. 9014)

SANITATION CONTROLS

Based on the on-site audit of Establishment 9014, Northern Ireland's inspection system had controls in place for adequate light, ventilation, plumbing/sewage, and water supply.

Sanitation Standard Operating Procedures (SSOPs)

Establishment 9014 was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs did not meet the FSIS on-going requirements. The following deficiencies were observed:

1. Repeated deficiencies of cleaning the equipment (meat scraps and fat) were observed during the pre-operational sanitation.

2. The SSOP documents did not accurately reflect the conditions observed in the establishment.

3. The SSOP records were not descriptive enough of some deficiencies observed on the pre-operational sanitation and preventive action was not included.

4. Pieces or particles, possibly rust from the overhead ventilation unit, were observed on the boning table. Although the contamination of the belt was corrected immediately, the source of the contamination was not positively identified and corrected at the time of this audit.

Establishment Grounds and Pest Control

1. The offal area requires upgrading. This issue was going to be resolved by the inspection service officials.

2. Moths and flies were observed inside the establishment. There was a commitment from the inspection service to correct this deficiency.

Establishment Construction/Maintenance

1. Two doors were not completely closed to the outside elements because of structural damages. This deficiency was scheduled for correction by the establishment and the inspection service.

2. A rusty air fan was observed over the boning table. This was scheduled for correction by the establishment.

Dressing Rooms/Lavatories

A waste receptacle was missing next to a lavatory in the shipping area. This deficiency was corrected immediately by the establishment management.

Equipment and Utensils

1. Dirty trays were observed in the boning room during the pre-operational sanitation. The establishment officials corrected this deficiency.

2. A conveyor belt with deep knife cuts and holes was being used with exposed product. This belt was placed in service after the inspection service official requested replacement of a conveyor belt with more extreme holes and cuts. It is unknown whether the inspection service official had observed the replacement belt in use prior to the time of this audit.

Employee Hygiene

Working clothes were observed in the street clothes dressing room. Working and street clothes should be separated from each other to prevent contamination. This deficiency was corrected immediately by the establishment officials.

ANIMAL DISEASE CONTROLS

Northern Ireland's meat inspection system had controls in place to ensure adequate disposition, condemned and restricted product control, and procedures for the sanitary handling of returned and rework product.

Tuberculosis and Brucellosis are present in this country, but Northern Ireland has been declared free of Foot-and-Mouth Disease since January 10, 2002.

There were no reports of outbreaks of animal diseases with public-health significance since the previous U.S. audit. There was a system of full identification and tracking of movement of all bovines from birth to death called Animal and Public health Information System. Information was also being provided to DARDNI by veterinarians at all barns and when doing tuberculin testing.

RESIDUE CONTROLS

Northern Ireland's National Residue Testing Plan for 2002 was being followed and on schedule. The Northern Ireland inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

SLAUGHTER/PROCESSING CONTROLS

The meat inspection system of Northern Ireland had controls in place to ensure adequate pre-processing trim, processed product reinspection, identification of ingredients, packaging materials, laboratory confirmation, label approvals, inspector monitoring, processing equipment, and post-processing handling.

HACCP Implementation

Establishments approved to export meat products to the United States are required to have developed and implemented a Hazard Analysis Critical Control Point (HACCP) system. The HACCP system was evaluated according to the criteria employed in the U.S. domestic

inspection program. The data collection instrument used to evaluate the HACCP program accompanies this report (Attachment B).

The FSIS auditor determined that the HACCP program in Establishment 9014 did not meet the FSIS regulatory implementation requirements. The findings were:

1. The HACCP plan did not include the verification requirements for calibration of process monitoring instruments, direct observation of monitoring activities and corrective actions, and reviews of records.

2. Corrective action requirements for identifying and eliminating the cause of the deviation were not fully addressed in the establishment's HACCP plan to ensure that the CCP is under control.

3. Pre-shipment review was conducted but did not clearly indicate whether all critical limits were met, corrective action was taken, and proper disposition of product was performed if deviation occurred.

Testing for Generic *E. coli*

Establishment 9014 was not required to meet the basic FSIS regulatory requirements for generic *E. coli* testing because it does not slaughter animals for export to the United States. This establishment did have adequate controls in place to prevent meat products intended for domestic consumption from being commingled with products eligible for export to the United States.

ENFORCEMENT CONTROLS

Inspection System Controls

The DARDNI inspection system controls [control of inspection samples, boneless meat reinspection, shipment security including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls, and the importation of only eligible meat products from other counties for further processing] were not found to be in place based on deficiencies regarding the establishment's process controls and the following deficiencies:

1. Inedible product was not denatured and stored under lock.

2. There was no timely response to some of the sanitary and enforcement problems indicated by the inspection officials from establishment representatives (i.e., rusty fan on the refrigeration unit, cuts on the conveyor belt).

Testing for *Salmonella* Species

Establishment 9014 was not required to meet the basic FSIS regulatory requirements for *Salmonella* testing since this establishment did not slaughter animals or produced ground meat for export to the United States.

Species Verification Testing

At the time of this audit, Northern Ireland was not exempt from the species verification-testing requirement. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements.

Monthly Reviews

There were two internal reviewers designated as Regional Veterinary Managers assigned to Northern Ireland's meat inspection system. Both were veterinarians with at least five years of experience.

In general, establishments certified to export to the United States are being reviewed once per month by one of the internal reviewers. DARDNI does not announce these reviews to the establishment management, but do announce them to its inspection personnel.

Copies of each report generated by the internal reviewers are maintained at the establishment and at DARDNI headquarters. The internal reviewer also keeps a copy.

Enforcement Activities

Northern Ireland had developed a full system of enforcement capability, which was documented in an information packet entitled "Veterinary Services Prosecutions Policy", which was available to the general public. This report contained summaries of official DADRNI enforcement activities and actions.

Exit Meetings.

An exit meeting was conducted in on August 7. The participants included Mr. Colin Hart, Supervisory Veterinary Officer; Mr. Tom Coulter, Divisional Veterinary Officer; Mr. Henry Flynn, Veterinary Officer, Mr.; Robert Huey, Divisional Veterinary Officer, APHIS; and Dr. Oto Urban, International Audit Staff Officer, FSIS.

The following was discussed:

Deficiencies observed during the establishment visit including inadequate SSOP implementation and documentation, pest control, HACCP implementation and documentation, and denaturing of inedible product.

CONCLUSION

FSIS conducted a special audit at the request of the Government of Northern Ireland. The audit consisted of reviewing only Establishment 9014, which was not certified at the time of this audit to export meat to the United States. FSIS has determined that this establishment was not in total compliance with U.S. import requirements. Based on this audit, the inspection system of Northern Ireland was found to have effective controls in some areas to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. However, the inspection system was found to have ineffective controls regarding other inspection areas including deficiencies in SSOP and HACCP implementation

Dr. Oto Urban (Signed) *Dr. Oto Urban*
International Audit Staff Officer

ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instrument for *E. coli* testing *(not applicable)*
D. Data collection instrument for *Salmonella* testing *(not applicable)*
E. Laboratory audit form *(not applicable)*
F. Individual Foreign Establishment Audit Forms
G. Written Foreign Country's Response to the Draft Final Audit Report

Attachment A

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Fre-quency addressed	6. Respons-ible indiv. identified	7. Docu-mentation done daily	8. Dated and signed
9014	√	√	√	√	√	√	no	√

Attachment B

Data Collection Instrument for HACCP Programs

One establishment approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis that includes food safety hazards likely to occur.
3. The analysis includes the intended use of or the consumers of the finished product(s).
4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
7. The plan describes corrective actions taken when a critical limit is exceeded.
8. The HACCP plan was validated using multiple monitoring results.
9. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
10. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
11. The HACCP plan is dated and signed by a responsible establishment official.
12. The establishment is performing routine pre-shipment document reviews.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. Use & users included	4. Plan for each hazard	5. CCPs for all hazards	6. Monitoring is specified	7. Corr. actions are described	8. Plan validated	9. Adequate verific. procedures	10.Adequate documentation	11. Dated and signed	12.Pre-shipmt. doc. review
9014	√	√	√	√	√	√	no	no	√	√	√	no